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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE META PIXEL TAX FILING CASES

This document relates to:

All Actions

Master File No. 5:22-cv-07557-PCP (VKD)

**PLAINTIFFS' RESPONSE TO
DEFENDANT META PLATFORMS,
INC.'S ADMINISTRATIVE MOTION TO
CONSIDER WHETHER PLAINTIFFS'
MATERIALS SHOULD BE SEALED**

Date Action Filed: December 1, 2022
Honorable P. Casey Pitts

1 Pursuant to Civil Local Rule 79-5(f), Plaintiffs file this response to Defendant Meta
2 Platforms, Inc.'s ("Meta") Administrative Motion to Consider Whether Plaintiffs' Materials Should
3 Be Sealed ("Motion"). See ECF No. 193. Plaintiffs respectfully request that the Court seal the
4 portions of Meta's Opposition to Plaintiffs' Motion for Voluntary Dismissal of Plaintiff Crystal Craig
5 ("Opposition"), and Declaration of Natalie Hausknecht ("Declaration"), identified in Meta's Motion.
6

7 The Ninth Circuit applies one of two standards when determining whether to seal materials:
8 (1) the "good cause" standard; and (2) the more stringent "compelling reasons" standard. *Center for*
9 *Auto Safety v. Chrysler Group, LLC*, 809 F.3d 1092, 1097-99 (9th Cir. 2016). For the "compelling
10 reasons" standard to apply, the materials at issue must be "*more* than tangentially related to the merits
11 of the case." *Id.* at 1099 (emphasis added). By contrast, the good cause standard acts as an exception
12 to the strong preference for public access and applies to materials that do not go to the merits of the
13 case. See *id.* at 1097. Regardless of which standard is applied, a request "must be narrowly tailored
14 to a limited amount of information." *TML Recovery LLC v. Cigna Corp.*, No. 8:20-cv-0269-DOC-
15 JDE, 2023 WL 12011238, at *3 (C.D. Cal. Aug. 7, 2023).
16

17 Meta's proposed redactions in both the Opposition and Declaration concern Plaintiff Craig's
18 sensitive personal circumstances surrounding her inability to remain a named plaintiff in this
19 litigation.¹ The materials sought to be redacted are, at best, only tangentially related to the merits of
20 the case, and thus fall under the good cause exception. Good cause exists because the redactions are
21 related to Plaintiff Craig's health and personal family circumstances. See *Clark v. InComm Financial*
22 *Services, Inc.*, No. EDCV 22-1839 JGB (SHKx), 2024 WL 4744041, at *5 (C.D. Cal. Sept. 13, 2024)
23 (finding good cause to seal reference to plaintiffs' medical condition); *Vangieson v. Austin*, No.
24 20cv1033-LAB-LL, 2021 WL 3848425, at *2 (S.D. Cal. Aug. 16, 2021) (finding good cause to seal
25
26

27
28 ¹ Plaintiffs seek to seal the same sensitive information in its motion to dismiss filings. See ECF
No. 187.

materials containing “sensitive and private health information”); *Jurgens v. Dubendorf*, No. 2:14–cv–2780–KJM–DAD, 2015 WL 6163464, at *2 (E.D. Cal. Oct. 19, 2015) (declining to decide whether compelling reasons or good cause standard applied because under either standard, public disclosure of medical information “would unnecessarily broadcast detailed, private, and sensitive information about [plaintiff’s] mental and physical health”); *cf. Bois v. Levi Strauss & Co.*, No. 23–CV–02772–TLT, 2024 WL 4004045, at *2 (N.D. Cal. Feb. 22, 2024) (redacting information regarding minor children). The proposed redactions are also narrowly tailored and limited to specific pieces of information.

For the foregoing reasons, Plaintiffs respectfully request that this Court seal the materials identified by Meta in its Motion.

Dated: June 26, 2025

By: /s/ Michael Liskow
Michael Liskow

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